

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

HANS MOKE NIEMANN,

Plaintiff,

vs.

SVEN MAGNUS ØEN CARLSEN A/K/A  
MAGNUS CARLSEN, PLAY MAGNUS AS  
D/B/A PLAY MAGNUS GROUP, CHESS.COM,  
LLC, DANIEL RENSCH A/K/A “DANNY”  
RENSCH, AND HIKARU NAKAMURA,

Defendants.

Case No. 4:22-cv-01110-AGF

**DEFENDANT CHESS.COM, LLC’S MEMORANDUM IN RESPONSE  
TO THE COURT’S JANUARY 19, 2023 ORDER**

**COMES NOW** Defendant Chess.com, LLC (“Chess.com”), by and through the undersigned counsel, and in response to this Court’s Memorandum and Order dated January 19, 2023 (ECF No. 80), respectfully states as follows:

On December 9, 2022, Chess.com filed its Rule 7.1 Corporate Disclosure identifying Chess.com’s sole member, Checkmate Intermediate Holdings LLC, and Checkmate Intermediate Holdings LLC’s sole member, Chess Holdings, LLC (“HoldCo”). ECF No. 68-1. The disclosure further identified the approximately 50 individuals and entities that are members of HoldCo. *Id.* As such, Chess.com sought leave to file the disclosure under seal for the reasons stated in its sealed memorandum in support and subsequent reply brief. ECF Nos. 67, 68, 73.

On January 3, 2023, this Court granted Chess.com’s request for further clarification and gave Chess.com an extension of time to file its disclosure statement up to and including January 13, 2023. ECF No. 74. The Court thereafter entered an order on January 19, 2023 directing Chess.com to advise whether it still seeks to file the disclosure under seal, and if so, the continued need to file the disclosure under seal. ECF No. 80.

Defendant Chess.com refers to its Rule 7.1 Corporate Disclosure Statement filed under seal on December 9, 2022, and incorporates herein the reasons for sealing addressed in the motion for leave to file under seal that accompanied Chess.com's December 9, 2022 Rule 7.1 Corporate Disclosure Statement, memorandum in support thereof, and later-filed reply brief. ECF Nos. 67, 68, 68-1, 73. In the event the Court would accept a more limited disclosure than that which has already been filed, please find attached an amended disclosure pursuant to Rule 7.1 properly identifying Checkmate Intermediate Holdings LLC as Chess.com's sole member and HoldCo. as Checkmate Intermediate Holdings LLC's sole member. If the attached disclosure is sufficient, Chess.com additionally requests leave to withdraw its motion for leave to file under seal, memorandum in support, reply brief in support, and prior disclosure, and requests that the Clerk of Court delete or otherwise remove these documents from the docket (ECF Nos. 67, 68, 68-1, 73).

DATED: January 26, 2023

/s/ Nima H. Mohebbi

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Respectfully submitted,

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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on January 26, 2023, the foregoing document was served on all counsel of record by ECF.

DATED: January 26, 2023

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